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California Business, Consumer Services and
Housing Agency

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

No.: 4:22-MD-03047-YGR (PHK)

THIS DOCUMENT RELATES TO:

ALL CASES

**DECLARATION OF J. LEAH CASTELLA
IN SUPPORT OF CALIFORNIA
EXECUTIVE AGENCIES' MOTION TO
ENLARGE TIME FOR SUBSTANTIAL
COMPLETION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF J. LEAH CASTELLA
IN SUPPORT OF CALIFORNIA
EXECUTIVE AGENCIES' MOTION TO
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No. 4:22-MD-03047-YGR (PHK)

DECLARATION OF J. LEAH CASTELLA

I, Leah Castella, declare under penalty of perjury as follows:

1. I am an attorney licensed to practice law in the State of California and am employed by the law firm of Burke, Williams Sorensen, LLP (“Burke”). I serve as co-counsel for Nonparties Office of the Governor of California, California Department of Finance, California Department of Public Health, and California Department of Consumer Affairs (together, the “California Executive Agencies”). The facts set forth herein are personally known to me, and if called upon to testify, I could and would competently do so.

2. Meta provided initial search terms to the California Executive Agencies on December 9, 2024. The California Executive Agencies provided Meta with a preliminary report of hits for those search terms on December 16, 2024, showing that the terms yielded millions of hits, including over 2 million hits for the California Department of Public Health alone.

3. As soon as it became clear that internal resources were not going to be sufficient to meet the deadlines set by the Court, given the compressed timeline for production, broad requests, and high volume of documents for review, the agencies promptly retained my firm, which has specialized expertise managing productions of this magnitude for public agencies, and a competitive e-discovery vendor, Consilio.

4. Even before finalizing a set of agreed-upon search terms with Meta, the agencies began transferring data to Consilio. The data transfer, processing, and validation process took several days for each agency and involved work done in the evenings, overnight, and over several weekends. Consilio provided 24/7 access to the agencies to ensure no time was lost.

5. On January 15, 2025, Meta and the California Executive Agencies agreed to a set of search terms with hit caps for each agency. Under that agreement, Meta would provide revisions to the search terms that would yield a set of documents no greater than that cap. The process required the agencies to implement Meta’s revisions to search terms, which in turn required re-formatting and

1 re-processing the revised search terms across agency data, to generate new hit reports, which would
2 then inform further search term refinements.

3 6. Even with Consilio's robust technological capabilities and systems, the sheer
4 computing time required to run various iterations of search terms responsive to Meta's renewed
5 demands was far greater than expected during the meet and confer process with Meta that led to an
6 agreement intended to meet the February 7 deadline. For example, computer processing time for
7 searches on the California Department of Public Health data alone was in excess of 20 hours extending
8 over multiple days, not including many additional hours of attorney and vendor staff time managing
9 the process.

10 7. As soon as it became clear that the agencies would be unable to meet the
11 February 7, 2025 substantial completion deadline, the agencies retained external review teams at Burke
12 and Consilio. They subsequently increased those external review teams to ensure that they would be
13 as close to substantially complete as possible by the February 7, 2025 deadline. In total, the agencies
14 have retained more than 120 internal and external reviewers, many working evenings and weekends.

15 8. Together, the agencies will have produced over 277k pages of records by
16 February 7, 2025. Even so, more remains to be done, and the Agencies' review continues apace.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed this
18 7th day of February, 2025, in Oakland, California.

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21 J. Leah Castella